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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

CYNTHIA STELLA, and the ESTATE OF
HEATHER MILLER,

Plaintiff,

v.

DAVIS COUNTY, SHERIFF TODD
RICHARDSON, MAVIN ANDERSON, JAMES
ONDRICEK,

Defendants.

Case No. 1:18-cv-002

**PROTECTIVE ORDER
(Utah AG Records)**

Judge Jill Parrish

BASED upon Rule 26(c) of the Federal Rules of Civil Procedure and the stipulation and motion by plaintiffs and the state of Utah, the court finds good cause to enter a protective order regarding the following described records that are responsive to a subpoena served upon the Office of the Utah Attorney General (OAG) by plaintiffs:

1. AG Investigation:
 - a. Documents:
 - AG Report
 - Cell Measurements

- Davis County Internal Affairs Report
- Davis County Jail Policy
- Davis County Officer Involved Critical Incident Protocol
- Emergency Medical Report
- Jail Deputy Reports
- Jail Medical Housing Information
- *Jail Schematic
- Jail Staff Schedules
- Miller Arrest Report
- Miller Jail Staff Interactions
- Letter to Troy Rawlings
- Letter from Cynthia Stella
- b. Cell photos:
 - Panoscan Directions
 - Panoscan Inside L-7
 - Panoscan K12 Inside
 - Panoscan K Overview
 - Panoscan Shot 4 Lima Unit
 - Cell/common areas Photos (65)
- c. Interviews:
 - DCSO - Deputies Lloyd and Johnson
 - DCSO - Deputy Lopez
 - DCSO - Deputy Rogers
 - DCSO - Deputies Wall and Luscius
 - EMS – Harvey
 - EMS – Pollock
 - Other - Cindy Stella
- d. Audio/video:
 - Dispatch 911 ATL 12-20-16 0227
 - Dispatch ATL on Law Channel
 - Dispatch - Traffic Stop ATL
 - Dispatch - Medical Jail 12-21-16 2040
 - Dispatch Medical on Law Channel
 - Original Arrest Footage D16-11540 Hart Heather Miller
 - Original Arrest Footage D16-11540 Larsen Heather Miller

2. Weber County Sheriff Investigation:

- a. Documents:
 - Detective Notes
 - Hospital Report
 - Medical Involvements Notes
 - *Miller Criminal History
 - OME Report
 - OMS Printouts
 - Telephone posts-logs

Weber County SO Report
Witness Inmates
b. Jail Surveillance Footage:
Kilo Video
Legacy Video
Lima Video
Medical Video
c. Jason Johnson Phone Calls
509702
511452
512262
d. CSI Photos: (27 Photos)
e. Autopsy Photos: (43 Photos)

With the exception of schematic drawings of secure areas within the Davis County, Utah Jail and the Heather Miller Criminal History, it is ordered that the OAG will provide to plaintiffs copies of the items listed above. Social security numbers, driver license numbers and emergency contact information for inmates will be redacted. Home telephone numbers for employees of the Davis County Sheriff's Office working in the jail will be redacted. Plaintiffs and all other parties to this case who receive copies of the items from plaintiffs shall be restricted to the duplication or dissemination of the information to only those individuals directly working on the parties' litigation teams on a needs-to-know basis solely for use in this litigation.

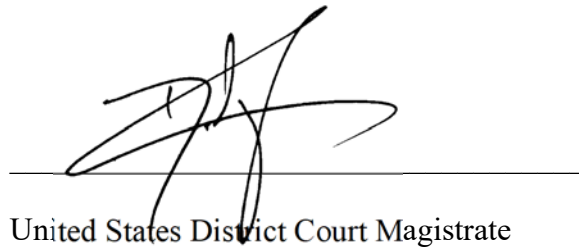
Furthermore, to prevent leaking information into the public realm that might compromise jail security or constitute a violation of the privacy of non-parties to the litigation, the parties are ordered to provide to the OAG, within thirty (30) days after entry by this court of a final judgment in this case and the exhaustion of any right to appeal, certification in writing that all information in their possession, the original source for which was from the items listed above, has been permanently destroyed.

In regard to the schematic drawings of the secure area within the Davis County Jail which are within the possession and control of the OAG and the Heather Miller Criminal History, it is ordered that the parties, upon giving reasonable advance notice, may arrange to view them at the office of counsel for the state of Utah but no copies of the drawings or history are to be released to plaintiffs or other parties by the OAG.

IT IS SO ORDERED.

Dated this 19th day of June, 2018

By the court.



United States District Court Magistrate

CERTIFICATE OF MAILING

This is to certify that on this _____ day of June, 2018, I electronically filed the foregoing **PROTECTIVE ORDER (Utah AG Records)** with the Clerk of Court using the CM/ECF system which sent notification of such filing to all counsel on record.

/s/ Rosie McDonough
Legal Assistant III,
Utah Attorney General's Office